

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Therisa D. Escue, Billy R. Escue, Jr.,
Kim Schelbe, Brian P. Weatherill,
Kenneth C. Morandi, Jill Jeffries, and
Daniel Singh on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

United Wholesale Mortgage, LLC,
UWM Holdings Corporation, SFS
Holding Corp., and Mathew Randall
Ishbia,

Defendants.

Case No. 2:24-cv-10853-BRM-DRG

Hon. Brandy R. McMillion,
United States District Judge

Hon. David R. Grand,
Magistrate Judge

DECLARATION OF STEPHEN J. COWEN

I, Stephen J. Cowen, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney with the law firm Jones Day, counsel to Defendants United Wholesale Mortgage, LLC, UWM Holdings Corporation, SFS Holding Corp., and Mathew Randall Ishbia (“Defendants”) in the above-captioned action. As such, I am fully familiar with the facts set forth herein.

2. I make this Declaration based upon my personal knowledge, as informed by the documents attached hereto and my involvement in this matter.

3. I submit this Declaration in connection with Defendants' Reply in Support of their Motion for Relief Under Rule 11, 28 U.S.C. § 1927, and the Court's Inherent Powers Based on New Allegations in the First Amended Complaint filed in the above-captioned matter.

4. Attached hereto as Exhibit A is a true and correct copy of an article published by Hunterbrook Media on April 2, 2024 titled "Dear Reader – Hunterbrook Media Launch." Highlighting has been added to relevant portions of the article. The article is publicly available at the following hyperlink: <https://hntrbrk.com/dear-reader/>.

5. Attached hereto as Exhibit B is a true and correct copy of an article published by Experian and titled "620 Credit Score: Is it Good or Bad?" Highlighting has been added to relevant portions of the article. The article is publicly available at the following hyperlink: <https://tinyurl.com/yc6ez3kj>.

6. Attached hereto as Exhibit C is a true and correct copy of a webpage published and maintained by Fannie Mae, the relevant portion of which is titled "General Requirements for Credit Scores." Highlighting has been added to relevant portions of the webpage. This webpage is publicly available at the following hyperlink: <https://tinyurl.com/34n2c43m>.

7. Attached hereto as Exhibit D is a true and correct redacted copy of Plaintiff Morandi's Borrower's Certification and Authorization, dated May 19, 2022. Highlighting has been added to relevant portions of the document.

8. Attached hereto as Exhibit E is a true and correct redacted copy of Plaintiff Schelble's Borrower's Certification and Authorization, dated April 5, 2021. Highlighting has been added to relevant portions of the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 14, 2025

A handwritten signature in black ink, appearing to read "SJC", is positioned above a horizontal line.

Stephen J. Cowen